

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF NEW YORK

CONSUMER FINANCIAL PROTECTION  
BUREAU, *et al.*,

Plaintiffs,

v.

STRATFS, LLC (f/k/a STRATEGIC  
FINANCIAL SOLUTIONS, LLC), *et al.*,

Defendants, and

DANIEL BLUMKIN, *et al.*,

Relief Defendants.

24-CV-40 (EAW) (MJR)

**NOTICE OF THE BUSH LAKE TRUST’S MOTION CHALLENGING  
THE RECEIVER’S DETERMINATION THAT BUSH LAKE IS A  
RECEIVERSHIP DEFENDANT**

Nature of Action:	Enforcement of the Telemarketing and Consumer Fraud and Abuse Prevention Act and the Telemarketing Sales Rule.
Movant:	Relief Defendant The Bush Lake Trust (“Bush Lake”).
Date and Time:	To be set by the Court.
Place:	Before Hon. Michael J. Roemer, United States Magistrate Judge, at the Robert H. Jackson United States Courthouse, 2 Niagara Square, Buffalo, New York 14202.
Supporting Papers:	Memorandum of law, dated April 8, 2025, with attached Exhibits A and B.
Answering Papers:	To be set by the Court. If the Court does not set a deadline, answering papers are due by April 22, 2025.
Reply Papers:	Bush Lake intends to reply. If the Court does not set a deadline, reply papers are due seven days after answering papers are filed.
Relief Requested:	An order (i) declaring that the Receiver has no authority over Bush Lake, either because Bush Lake is not a Receivership Defendant, because the receivership defendant mechanism is fatally defective and the designation is void ab initio, and/or because the receivership defendant designation does not apply to parties; and (ii) awarding any other or additional relief that the Court deems appropriate.

Grounds for Relief:

Federal Rule of Civil Procedure 65, the equitable principles it codifies, and applicable case law; the Preliminary Injunction entered on March 4, 2024; and the Court's inherent authority.

Oral Argument:

Requested.

Dated: Buffalo, New York  
April 8, 2025

**HOOVER & DURLAND LLP**  
*Attorneys for Relief Defendant The Bush Lake Trust*

By: s/Timothy W. Hoover  
Timothy W. Hoover  
Spencer L. Durland  
561 Franklin Street  
Buffalo, New York 14202  
(716) 800-2600  
*thoover@hooverdurland.com*  
*sdurland@hooverdurland.com*